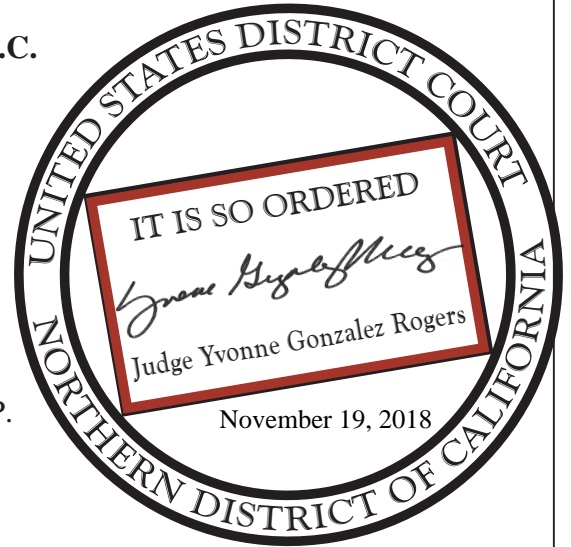


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CORPORATION



**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

GREG REINECKE,

Plaintiffs,

v.

DEPUY ORTHOPAEDICS, INC.,  
JOHNSON & JOHNSON SERVICES,  
INC., JOHNSON & JOHNSON, INC.,  
DEPUY INTERNATIONAL, LTD.,  
THOMAS P. SCHMALZRIED, M.D.,  
THOMAS P. SCHMALZRIED, M.D. A  
PROFESSIONAL CORPORATION;  
and DOES 1 through 20, inclusive,

Defendants.

Case No. 3:18-cv-06848-YGR

**STIPULATION TO EXTEND TIME TO  
RESPOND TO COMPLAINT BY NOT  
MORE THAN 30 DAYS (L.R. 6-1(a)) RE  
DEFENDANTS THOMAS P.  
SCHMALZRIED, M.D. AND THOMAS P.  
SCHMALZRIED, M.D. A PROFESSIONAL  
CORPORATION**

Complaint served: October 25, 2018  
Removed: November 12, 2018  
Current Response Date: November 19, 2018  
Agreed Response Date: December 19, 2018

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff Greg Reinecke and Defendants Thomas P. Schmalzried M.D. and Thomas P. Schmalzried, M.D. A Professional Corporation, by and through their respective counsel, hereby stipulate as follows:

1) Plaintiff's Complaint was filed in San Francisco County Superior Court on September 24, 2018, and it was served on defendants on October 25, 2018.

2) The action was removed to the U.S. District Court on November 12, 2018, and the parties anticipate the action will be transferred by the Judicial Panel on Multidistrict Litigation to *In re DePuy Orthopaedics, Inc. Pinnacle Hip Implant Products Liability Litigation*, MDL No. 2244, currently pending in the United States District Court for the Northern District of Texas.

3) In light of the anticipated transfer, plaintiff and defendants have agreed that defendants Thomas P. Schmalzried, M.D. and Thomas P. Schmalzried, M.D. A Professional Corporation, may have an extension of time to respond to plaintiffs' Complaint, through and including December 19, 2018.

4) By entering into this stipulation, defendant does not waive, and specifically preserves, any and all defenses he has, including lack of personal jurisdiction and all other defenses available under Federal Rule of Civil Procedure Rule 12, and otherwise.

**IT IS SO STIPULATED.**

DATED: November 16, 2018

MINTZ LEVIN COHN FERRIS GLOVSKY AND  
POPEO P.C

By: /s/ Christopher P. Norton

Ralph A. Campillo, Esq.  
Christopher P. Norton, Esq.  
Nicholas A. Weiss, Esq.

Attorneys for Defendants  
THOMAS P. SCHMALZRIED, M.D. and  
THOMAS P. SCHMALZRIED, M.D. A  
PROFESSIONAL CORPORATION

DATED November 16, 2018

SEEGER SALVAS & DEVINE LLP

By: /s/ Adam R. Salvas

Kenneth M. Seeger, Esq.  
Adam R. Salvas, Esq.  
Brian J. Devine, Esq.

Attorneys for Plaintiff  
GREG REINECKE

1            \*Pursuant to Local Rule 5-1(i)(3), Christopher Norton hereby attests that all other  
2            signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and  
3            have authorized the filing.